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FILED
DISTRICT COURT OF GUAM

APR 11 2006

MARY L.M. MORAN
CLERK OF COURT

Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF GUAM

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FRANKIE BLAS CASTRO,

Defendant.

CRIMINAL CASE NO. 05-00044

**GOVERNMENT'S MOTION FOR
A DOWNWARD DEPARTURE**

The United States hereby moves this Honorable Court for a departure from the Guidelines total offense level of 32, as provided by USSG Section 5K1.1, on the basis that defendant has rendered substantial assistance to the government in its investigation of drug trafficking on Guam.

The government is filing under seal a separate sentencing memorandum concerning the details of that cooperation. Defendant's present offense level of 33 calls for a range of 135-168 months incarceration. The government is recommending that defendant total offense level be

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1 reduced by three levels to 32, which provides for a range of 121-151 months incarceration. The
2 government is recommending that defendant receive 121 months incarceration.

3 RESPECTFULLY SUBMITTED this 11th day of April, 2006.

4 LEONARDO M. RAPADAS
5 United States Attorney
6 Districts of Guam and the CNMI

7 By: 
8 KARON V. JOHNSON
9 Assistant U.S. Attorney

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